Case 3:24-cr-02479-LS

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November 04, 2024 CLERK, U.S. DISTRICT COURT WESTERN DISTRICT OF TEXAS

**United States District Court** Western District of Texas El Paso Division

Veronica Montoya DEPUTY

United States of America, Plaintiff,

EP:24-MJ-3929-ATB

v.

Romannie Shrouder, Defendant.

## **United States' Motion to Detain Defendant Without Bond and Motion for Continuance**

Comes now the United States of America, by and through the United States Attorney for the Western District of Texas, and pursuant to 18 U.S.C. § 3142(e) and (f), files this, its Motion to Detain Defendant Without Bond and Motion for Continuance, and for cause, would respectfully show unto the Court the following:

- The Defendant was arrested for a violation of Title 18, United States Code, Section 1. 922(n), Receipt of Firearm by Person under Felony Indictment.
  - 2. The Defendant is a United States citizen.
- 3. The Defendant has a prior criminal history. The Defendant was convicted in 2022 for Aggravated Assault with a deadly weapon.
- 4. There are no conditions or combination of conditions which will reasonably assure the safety of the community should the Defendant be released on bond.
- 5. There are no conditions or combination of conditions which will reasonably assure the appearance of the Defendant at future court settings.

The Government would further move the Court for a three-day continuance of the detention hearing from the date of the initial appearance.

WHEREFORE, premises considered, the Government respectfully prays the Court to hold the above-named Defendant without bail pending the final outcome of this case.

Respectfully submitted,

JAIME ESPARZA UNITED STATES ATTORNEY

By: Sean Wang

SHUHAO "SEÁN" WANG Assistant U.S. Attorney New Mexico State Bar #149505 700 E. San Antonio, Suite 200 El Paso, Texas 79901 (915) 534-6884